

Felony

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States District Court
Southern District of Texas
FILED

MAR 28 2014

United States of America

v.

1 Raul RAMIREZ Martinez

2 Claudia CERDA Lucio

3 Rafael DE LA CRUZ Bautista

4 Rodrigo GONZALEZ Alvarez

5 Rafael HERNANDEZ

6 Miguel Angel PUCHETA Malaga

Defendant

David J. Bradley, Clerk of Court

Case No.

B-14-381-MJ

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of March 27, 2014 in the county of Cameron in the Southern District of Texas, the defendant violated 8 USC 1324

an offense described as follows:

Knowing or in reckless disregard of the fact that aliens had come to, entered, or remained in the United States in violation of law, concealed, harbored, or shielded from detection, or attempted to conceal, harbor, or shield from detection, such aliens in any place, including any building or any means of transportation within the United States.

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.



Complainant's signature

Erasmo Chapa, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: March 28, 2014

City and state: Brownsville, Texas



Judge's signature

Ignacio Torteya III U.S. Magistrate Judge

Printed name and title

Attachment A

On March 27, 2014, Homeland Security Investigations Special Agents and U.S. Border Patrol Agents conducted a consensual search at a suspected undocumented alien stash-house located on Coral Court in Brownsville, TX. Approximately seventy-two undocumented aliens were apprehended at the residence.

While securing the residence, agents took possession of a cellular phone believed to have been left at the residence by the smugglers responsible for the stash-house. Agents identified cellular phone contact, "Clau", telephonically contacting the cellular phone left at the residence. "Clau" was later identified as Claudia CERDA-Lucio.

Agents, acting as undocumented aliens in an undercover capacity, contacted CERDA. Undercover Agents informed CERDA that immigration had apprehended most of the undocumented aliens at the house; however, they had managed to get away. Undercover Agents requested that CERDA pick them up from a local grocery store. CERDA informed the Undercover Agents that she would send an associate to pick them up.

While in the parking lot of a local grocery store, Undercover Agents were contacted by Raul RAMIREZ-Martinez. Three individuals, later identified as RAMIREZ, Rafael HERNANDEZ and Miguel PUCHETA-Malaga, instructed the Undercover Agents to enter a silver Ford Escape. Agents covering the scene detained the three aforementioned male individuals for questioning related to their involvement with the undocumented alien stash-house located on Coral Court.

RAMIREZ, HERNANDEZ and PUCHETA, under the advisement of the Miranda Warnings, stated they had contacted the Undercover Agents with the understanding that they were undocumented aliens. The subjects further stated that they were instructed to transport the undocumented aliens to a not yet disclosed location. RAMIREZ further advised agents of CERDA's involvement with the undocumented aliens apprehended at the aforementioned stash-house.

Based on information provided from a cooperating defendant, agents were able to locate Claudia CERDA- Lucio and Rafael DE LA CRUZ-Bautista at Calles Avenue in Olmito, TX. Both CERDA and DE LA CRUZ were listed as lessees of the residence on Coral Court, the aforementioned stash-house where seventy-two undocumented aliens were earlier apprehended. With the information provided by undocumented aliens during interviews, statements provided to agents by cooperating defendants and information gathered including lease documents for the residence at Coral Court, it was determined that CERDA and DE LA CRUZ were conspiring members of the Raul RAMIREZ-Martinez alien smuggling organization.

At approximately 3:00 pm, on March 27, 2014, Agents conducted a consensual search at the residence on Calles Avenue. Agents approached the front of the residence and identified themselves after knocking on the front door. Agents encountered a male identified as Rafael DE LA CRUZ-Bautista and stated he was the owner of the residence. Homeland Security Investigation Agents then asked for and were granted consent by DE LA CRUZ to search his residence.

A search of the residence resulted in the discovery of one female individual and one male individual, later identified as Claudia CERDA- Lucio and Rodrigo GONZALEZ.

Following a search of the house, CERDA, and DE LA CRUZ were advised they were being detained for their involvement of harboring seventy-two undocumented aliens. GONZALEZ was detained based on that fact that he was illegally present in the U.S.

B-14-321-111

Attachment A

Interviews of individuals involved provided the following information:

Raul RAMIREZ-Martinez admitted to his involvement in the harboring of undocumented aliens at the stash-house on Coral Court. RAMIREZ stated CERDA worked for him by harboring undocumented aliens. RAMIREZ also stated he was paid by unknown individuals in Mexico for smuggling undocumented aliens into the U.S. RAMIREZ stated all individuals in the vehicle were aware they were picking up undocumented aliens at the grocery store.


Claudia CERDA-Lucio admitted to being the stash house operator at the residence at Coral Court. CERDA stated she worked for RAMIREZ and was paid by RAMIREZ for harboring undocumented aliens. CERDA stated she rented the residence at Coral Court for the purpose of harboring undocumented aliens.

Rafael DE LA CRUZ-Bautista admitted to providing food for the undocumented aliens. CERDA stated undocumented aliens apprehended at the Coral Court residence had been recently moved from DE LA CRUZ's residence on Calles Avenue to Coral Court. CERDA stated she paid DE LA CRUZ for harboring undocumented aliens at his residence.

Rodrigo GONZALEZ admitted to being the caretaker at the stash-house on Coral Court. CERDA stated GONZALEZ was the caretaker of the aforementioned stash-house.

Miguel PUCHETA-Malaga was identified by a material witness as the driver who picked him up at the river after crossing illegally into the U.S. A separate material witness observed PUCHETA at the stash-house at Coral Court.

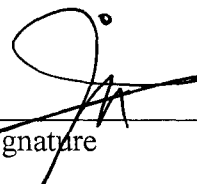
Rafael HERNANDEZ was identified by a material witness as the driver who picked him up at the river after crossing illegally into the U.S.


Complainant's signature

Erasmo Chapa, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: March 28, 2014


Judge's signature

City and state: Brownsville, TX

Ignacio Torteya III, Magistrate Judge
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